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March 7, 2023

Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

The conference is adjourned to March 16, 2023 at 2:30 p.m.

SO ORDERED.

/s/ Alvin Hellerstein
March 7, 2023

Re: *The Avon Company f/k/a New Avon LLC, et al. v. Fareva Morton Grove, Inc., et al.*, Case No. 22-cv-4724 (S.D.N.Y.)

Dear Judge Hellerstein:

I write as Fareva's counsel about the scheduling of the upcoming discovery conference with the Court. Yesterday, Your Honor issued an order rescheduling this week's conference, moving it up to Thursday, March 9, from its previously scheduled date of Friday, March 10. For the reasons explained here, I respectfully request that the conference be moved to Thursday, March 16, or a date thereafter that the Court's schedule permits.

On February 21, 2023, the Court scheduled a discovery conference for February 28 at 2:15 p.m. ECF 113. On February 22, Avon requested adjournment of the February 28 discovery conference, with Fareva's consent, due to its lead counsel's scheduled international travel. ECF 114. Avon's request noted that both parties' counsel were available on the alternative dates of March 8 (before Noon or after 2:30 p.m.) or March 10 (at any time). *Id.* On February 23, the Court granted Avon's request and adjourned the discovery conference to Friday, March 10 at 10:00 a.m. ECF 116. Yesterday, the Court rescheduled the discovery conference to Thursday, March 9 at 2:30 p.m. ECF 117.

One of Fareva's executives from France will be sitting for deposition noticed by Avon's counsel in New York on that date, March 9. In addition, I will be in Boston starting March 13 for a court hearing there the early part of next week and not back in New York until sometime on March 15.

We therefore write to request adjournment of the discovery conference currently scheduled for Thursday, March 9, to anytime on Thursday, March 16. Avon's counsel has advised us that Avon does not object to a brief adjournment, and the earliest date on which both parties' counsel are available is any time on Thursday, March 16.

As always, we thank the Court for its consideration of this request.

Respectfully,

/s/ Randy M. Mastro

Randy M. Mastro

cc: All Counsel of Record (via ECF)